

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MARC ELLIOT,

Plaintiff,

v.

HBO HOME ENTERTAINMENT CORP., a Delaware Corporation; JEHANE NOUJAIME, an individual; KARIM AMER, an individual; THE OTHRS, LLC, a Florida limited liability company; THE OTHRS LICENSING CORP., a Florida corporation; THE SQUARE, LLC, a New York limited liability company; ISABELLA CONSTANTINO, an individual; JOHN DOES 1–10,

Defendants.

Case No. 4:23-cv-01611-SEP

**DECLARATION OF SAMANTHA GRANDE**

I, Samantha Grande, hereby declare, under penalty of perjury, as follows:

1. I am a Tax Director for the Warner Bros. Discovery group, which includes Home Box Office, Inc. (“HBO,” incorrectly sued as “HBO Home Entertainment Corp.”).

2. I respectfully submit this declaration in support of Defendants’ motion to dismiss for lack of personal jurisdiction pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure and for improper venue pursuant to Rule 12(b)(3). The statements in this declaration are based on my personal knowledge, discussion with appropriate colleagues, and review of company records kept in the ordinary course of business.

3. HBO was incorporated in Delaware. It has a principal place of business in New York.

4. HBO has no employees who are residents of Missouri.

5. HBO has no offices or real estate in Missouri.
6. HBO is not registered to do business in Missouri.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Executed: January 12, 2024

*Samantha Grande*  
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Samantha Grande